

UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE: * CASE NO. 11-05121-ESL
*
RAFAEL LLERA OCASIO * CHAPTER 13
ANA M. FABREGAS AGUILAR *
Debtor (s) *

DEBTORS' MOTION FOR WITHDRAWAL OF FUNDS
TO THE HONORABLE COURT:

COMES NOW the debtors herein, through counsel, and very respectfully allege and pray as follows:

1. On February 22, 2013, the present was dismissed upon debtors' application for voluntary dismissal (Docket no. 100) .

2. On February 26, 2013, the Trustee filed a Report on Unclaimed Monies for secured creditor QUANTUM SERVICING CORPORATION, and deposited the amount of \$1,740.54 with the Clerk. (Docket no. 102).

3. That debtors are now trying to restructure its loan with its secured creditors and, being out of bankruptcy, needs the moneys deposited.

4. That under such circumstances, debtors are entitled to such monies and therefore requests an order directing payment of such amount to debtor.

WHEREFORE, it is respectfully requested from this Honorable Court that an order be entered directing the payment of such funds to debtors.

RESPECTFULLY SUBMITTED:

NOTICE OF TIME TO OBJECT

NOTICE is hereby given that: Parties in interest are granted fourteen (14) days from date of notice to appear and be heard. If no opposition is filed within such period of time, the Court could grant the remedy requested, upon the filing of a certificate by movant that adequate notice was given. Should an opposition be timely filed, the Court will set the

motion for hearing as a contested matter.

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I HEREBY CERTIFY that on this date copy of this motion has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to, Alejandro Oliveras, Esq., Chapter 13 Trustee and other participants in such CM/ECF system. I also certify that a I sent a true and exact copy of this document to the non CM/ECF participants listed in the Master Address filed with the Clerk in this case, including Quantum Servicing Corporation C/O Igor Dominguez, Esq., VIG Tower, Suite 1105, 1255 Ponce de León Ave., San Juan, PR 00907-3945

In San Juan, Puerto Rico, this 22nd. day of March, 2013.

s/Luis A. Medina Torres
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